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USDOC FOR 532/OEA/PLUDD/JSONDERM
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR PATRICK SANTILLO
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)

SUBJECT: EXTRANCHECK: PRE-LICENSE CHECK: TAL APPAREL LIMITED

REF: A) BIS e-mail PLC request dated October 14, 2009 B) D425104

¶1. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO), conducted a pre-license check at Tal Apparel Limited, Tal Building, 4th Floor, 49 Austin Road, Kowloon, Hong Kong (Tal). The purpose of the visit was to determine the suitability of Tal to be the ultimate consignee and end user of a Flir systems thermovision mounted thermal camera that is the subject of license application D425104. The item (ECCN 6A003) is controlled for national security (NS) reasons. The license applicant is Trek Equipment of Sausalito, California.

¶3. A search of the Hong Kong Companies Registry reveals that Tal has been in existence since 1983. Its registered capital is the Hong Kong equivalent of USD 80 million.

¶4. A review of the company's web site (www.talgroup.com) reveals that the Tal Group is a world leader in the production of clothing. The Tal Group manufactures (at locations throughout Asia) 1 out of every 6 dress shirts sold in the U.S. Its headquarters are in Hong Kong.

¶5. On October 23, 2009, ECO and FCS Commercial Assistant Carrie Chan visited the company and met with Eugene Lee, Human Capital Management, Cherry C.K. Tang, Senior Executive and Franky C.K. Lam Department Manager. Mr. Lee explained that Tal is purchasing 15 Flir cameras for use in the company's production facilities throughout Asia. They are intended to be used for rapid body temperature checks of employees entering production facilities to minimize the potential spread of flu among employees. Presently, the company uses low tech hand held devices to check employee temperatures and the Flir cameras will allow them to test employees much more rapidly and in a less invasive way.

¶6. As to the specific camera that is the subject of license application D425104, Mr. Lee stated that it would be held as a spare in Hong Kong (where there are no production facilities). In the event any of the other cameras needed replacement, the Hong Kong unit would be sent to the location in question. Mr. Lee stated that he did not believe application D425104 made this point clear. ECO found Tal employees to be open and credible in their explanations.

¶7. Based on the information detailed herein, ECO believes Tal to be a suitable recipient of controlled U.S. origin technology.

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